## WTERAGENCY ADVISORY GOOD 0000017-6

UNITED STATES OF AMERICA
OFFICE OF PERSONNEL MANAGEMENT
WASHINGTON, D.C. 20415

Secretariat Room 1304—1900 E St., N.W. Code 101, Ext. 26266 or Aroa Code 202—632-6266 FC.

Minutes of the IAG Committee on Personnel Research

September 25, 1979

The meeting opened with introductory remarks by Helen Christrup, Acting Director, PRDC, during which a brief history of the data collection and analysis work for the Uniform Guidelines was presented.

The meeting was then turned over to John Kraft, Chief, Examination Services, PRDC, who discussed the current status of our efforts to implement the data collection requirements of the Uniform Guidelines and outlined the roles of individual agencies in these efforts.

The following issues were covered:

- (1) A government-wide Systems Notice (OPM/GOVT-7) will be published in the Federal Register. This notice provides agencies with basic guidance for protecting race, sex, ethnic, and disability status data from unlawful use. A 60 day comment period must elapse before this notice will be in effect and before agencies may collect these data from applicants.
- (2) A standard form has been approved by OMB for agency use (OPM Form 1386; Back-ground Survey Questionnaire 79-2). This form will be used for two years; before its use can be extended OPM will need to provide OMB an evaluation of its effectiveness in furthering compliance with the guidelines.
- (3) Across the board authorization is being given to agencies to collect and analyze data. Strategies for actually collecting and analyzing data will be the responsibility of individual agencies.
- (4) On board work force statistical data cannot be used for most of this work. Data collection efforts for compliance with the Federal Equal Opportunity Recruitment Program go beyond the scope of statistical reporting outlined in FPM 713-3.
- (5) The extent to which OPM can assist agencies in determining the race, sex, and ethnic composition of existing OPM registers has not, as yet, been determined.

Jim Green of the General Counsel's Office, OPM, commented briefly on the legal situation relative to guidelines compliance. To date, no litigation against the Federal government regarding the Guidelines has been concluded, but all Federal agencies, as well as private employers, will be held responsible for compliance. Agencies may need to assure the courts of "good faith" efforts. It was pointed out that adequate data collection takes time. Furthermore, the adequacy of data collected may need to be defended on a case by case basis.

## Approved For Release 2002/08/12: CIA-RDP81-003142000200080017-6

A question and answer period at the close of the meeting produced further clarification of some relevant issues:

- (1) Minority group designators for the onboard work force should not be used for recruitment purposes for two reasons (a) the codes are different from those specified by OMB for the new agency form and (b) MGD codes are not voluntary designations, whereas data for recruitment, using the new form, are voluntary.
- (2) The new form should be administered to onboard employees when such employees become applicants in the course of various personnel selection processes.
- (3) Whether to collect data on a sample basis will be each agency's decision. OPM has issued no policy on this issue.
- (4) An agency may collect less data than requested on the new form but is prohibited from adding additional questions.
- (5) The best safeguard against low return rates of the form is a good public relations effort. Applicants should be provided with an honest statement as to why the data are being collected. This precaution, of course, cannot ensure a high return rate.
- (6) The question on the form regarding handicapped status has neglected the entire realm of disabilities other than physical (for example, dyslexia). It was pointed out that the particular wording of this question was done by OMB. Should the handicapped be covered by Title VII in the future, the question would be inadequate.